

1 THE HONORABLE JOHN C. COUGHENOUR
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 GRACE CAMPBELL,

11 Plaintiff,

12 v.

13 CATHOLIC COMMUNITY SERVICES OF
14 WESTERN WASHINGTON,

15 Defendant.

16 NO. C10-1579 JCC

17 DECLARATION OF ANDREA H. MCNEELY IN
18 SUPPORT OF PLAINTIFF'S MOTION FOR
19 AWARD OF FEES, LITIGATION EXPENSES,
20 AND AN AMOUNT TO OFF SET ADVERSE
21 TAX CONSEQUENSES

22 DATE NOTED: JUNE 1, 2012

23 I, Andrea H. McNeely, declare the following under penalty of perjury under the laws
24 of the United States of America:

25 1. I am one of the attorneys representing the Plaintiff herein, and I make the
26 following statements of my personal knowledge.

27 2. I am a partner at Gordon Thomas Honeywell LLP with experience in
28 representing a number of individuals at trial in employment cases, as well as experience
29 preparing and presenting other types of cases at trial. Throughout my career I have
30 devoted a significant portion of my practice to employment litigation, and over that time I
31 have prepared materials and presented at a number of CLEs on employment law topics.
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33 In 2005 James Beck accepted representation of an individual in a military discrimination

case that proceeded to trial in federal court in Seattle in 2007. After Mr. Beck's successful verdict in that case, Mr. Beck and I have worked together on a number of cases representing individuals who have been subject to military discrimination in their employment.

3. Mr. Beck and I have spent a significant amount of time and effort in preparing this case for trial from the time of accepting representation of Grace Campbell. In addition to plaintiff's contingency work, a substantial portion of my practice involves work on business litigation that is compensated through hourly fee arrangements. In preparing this case for trial, it was necessary for me to devote time and energy on Ms. Campbell's case that would otherwise have been spent on hourly matters. For example, there were two significant breach of contract matters that I was not able to work on because of the time and energy devoted to Ms. Campbell's case.

Dated this 17th day of May, 2012, at Tacoma, Washington.

GORDON THOMAS HONEYWELL LLP

Andrea H. McNeely, WSBA No. 36156

1 CERTIFICATE OF SERVICE
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I hereby certify that I served the attached DECLARATION OF ANDREA H. McNEELY IN SUPPORT OF PLAINTIFF'S MOTION FOR AWARD OF FEES, LITIGATION EXPENSES, AND AN AMOUNT TO OFF SET ADVERSE TAX CONSEQUENSES by causing the same to be served by CM/ECF e-service on counsel for defendant at tmerrick@mhlseattle.com and tnelson@mhlseattle.com.

8 Dated this 17TH day of May, 2012
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By:/s/ Jennifer Milsten-Holder _____
Jennifer Milsten-Holder
Gordon Thomas Honeywell LLP